

## US CERTIFIED MAIL. RETURN RECEIPT REQUESTED.

May 11, 2016

Attention: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency (US EPA)
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Submission of April PM10 Monitoring Report Pursuant to Clean Air Act, Section 114(a) Request

Amended Appendix B

Rain CII Carbon LLC, Robinson Calcining Plant

12187 East 950th Avenue, Robinson, Crawford County, Illinois

Dear US EPA Region 5 Compliance Tracker:

Rain CII Carbon LLC Robinson Calcining Plant (Rain CII) received an amended request for PM10 monitoring ("Appendix B") from US EPA Region 5 on September 22, 2015, in accordance with Section 114(a) of the Clean Air Act. Items 16 and 17 of the request require Rain CII to submit monthly reports of the PM10 monitoring and associated meteorological data to US EPA Region 5, whereas Items 10, 14, and 15 specify the content and format of the monthly reports.

In accordance with the requirements of the amended Section 114(a) request for PM10 monitoring, Rain CII is submitting, as enclosures, the following meteorological and PM10 monitoring data for April 2016:

- On compact disk (CD), Microsoft Excel file containing (1) hourly ASCII comma-delimited PM10 data, wind speed data, and wind direction data, and (2) one-hour and 24-hour average PM10 data correlated to one-hour and 24-hour average wind speed and wind direction data;
- log of April 2016 calibration data for the PM10 monitor and meteorological station;
- log of site visits and operator activities during April 2016;

MAIN: 618-544-2193

- log of monitoring system downtime for the PM10 monitor and meteorological station during April 2016; and
- Log of observed interferences impacting PM10 levels at the facility during April 2016.

FAX: 618-546-5123

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As required by Item 17, Rain CII is also submitting electronic versions of the above referenced data to Dakota Prentice at US EPA Region 5.

Rain CII would like to note the following:

- 1. One-hour averages of PM10 which are higher than 0.150 mg/m3 are noted, along with the corresponding wind direction and speed during the time of each measurement. No exceedances of the NAAQS (0.150 mg/m3 as a 24-hour average) are being reported for the month of April.
- 2. The PM10 monitor reported five instances of a sample concentration of 0.985 mg/m3, a full-scale sample value indicating maintenance activity, a power failure, or a malfunction, during the month of April. One instance of this sample value occurred on April 1, as a result of the data retrieval and maintenance process. The remaining instances of this sample value occurred on April 2 and April 6 and are believed to be the result of power failures/fluctuations. As recommended by the Met One manual (PM10 monitor), the 0.985 mg/m³ reading and data collected for the three hours following the 0.985 mg/m³ reading were not included in the daily averages. The samples following the interruption were discarded in order to minimize noise in the data during monitor stabilization.
- 3. No errors, aside from maintenance flags, were logged during the month of April 2016. After removing full-scale sample values and sample values believed to be the result of noise, the uptime for the PM10 Monitor for April 2016 was 98.3%.
- 4. The onsite weather station did not report during the month of April due to an undetected software malfunction. Meteorological data was therefore obtained from the weather station located at Robinson Municipal Airport.

Please contact me at (618) 546-6201, or at dan.fearday@raincarbon.com, if you require additional information regarding the submission of April PM10 monitoring data. Please direct technical questions regarding the submission to Bryan Schuetze, P.E. (Texas) at (985) 635-3412, or at bryan.schuetze@raincarbon.com.

Sincerely,

Dan Fearday Plant Manager

Robinson Calcining Plant

Enclosures

cc: Dakota Prentice, US EPA Region 5